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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
inclusive,

Defendants.

) CASE NO.: 2:23-cv-6302-HDV-AJR
)
) **DECLARATION OF OLIVIA FLECHSIG**
) **IN SUPPORT OF PLAINTIFF MARK**
) **SNOOKAL’S MOTION IN LIMINE NO. 2**
) **– DAUBERT MOTION TO EXCLUDE**
) **THE PURPORTED EXPERT OPINION**
) **TESTIMONY OF DR. UJOMOTI**
) **AKINTUNDE**
)
) *[Filed concurrently with Plaintiff’s Notice of*
) *Motion and Motion in Limine No. 2 – Daubert*
) *Motion to Exclude the Purported Expert*
) *Opinion Testimony of Dr. Ujomoti Akintunde*
) *and [Proposed] Order Granting Plaintiff’s*
) *Motion in Limine No. 2]*
)
) District Judge: Hon. Hernan D. Vera
) Magistrate Judge: Hon. A. Joel Richlin
) Action Filed: August 3, 2023
) Trial Date: August 19, 2025
)
) Hearing Date: July 24, 2025
) Hearing Time: 10:00 a.m.
) Courtroom: 5B
)
)

DECLARATION OF OLIVIA FLECHSIG

I, Olivia Flechsig, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. As such, I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I make this declaration in support of Plaintiff's Motion in Limine No. 2 – Daubert Motion to Exclude the Purported Expert Opinion Testimony of Dr. Ujomoti Akintunde.

3. On November 8, 2024, Defendant Chevron USA, Inc. ("Defendant") served its Second Amended Expert Witness Disclosures. In same, Defendant wrote the following disclosure regarding Dr. Ujomoti Akintunde ("Dr. Akintunde"), a non-retained expert witness:

"Staff Physician in Charge at Lekki Hospital (contact through Defendant's counsel). Dr. Akintunde may offer testimony at trial regarding her review of medical records or other documents, communications between and among Dr. Akintunde and other health care professionals concerning Plaintiff Mark Snookal and Plaintiff's medical history, health condition, and fitness to be medically cleared for the role of the REM position in Escravos, Nigeria in 2019."

4. I took the deposition of Dr. Akintunde on October 31, 2024, and I am in possession of a certified copy of her deposition transcript. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts from Dr. Akintunde's deposition transcript.

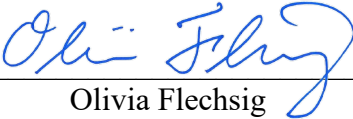
5. On June 17, 2025, Dolores Y. Leal and I met and conferred with counsel for Defendant, Tracey Kennedy and Robert Mussig, via Zoom videoconference regarding the topics required by Local Rule 16-2, including Plaintiff's anticipated Motions in Limine. Further to this call, on June 18, 2025, I sent a meet and confer email to Ms. Kennedy and Mr. Mussig to further meet and confer.

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1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct, and that this Declaration was executed on July 1, 2025, at
3 Los Angeles, California.

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5 Olivia Flechsig